

01-05-01

April 27, 2001

Mr. Rasik Raval
Gladieux Trading and Marketing, LLP
4133 New Haven Avenue
Fort Wayne, Indiana 46803

Dear Mr. Raval:

Re: Exempt Operation Status,
003-14155-00317

The application from Gladieux Trading and Marketing, LLP received on March 21, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following equipment located at 4133 New Haven Avenue, Fort Wayne, Indiana 46803 are classified as exempt from air pollution permit requirements:

- (a) Six (6) horizontal pressure vessels, identified as PV-1 through PV-6, built above ground. Each vessel has a capacity of 30,000 gallons and a maximum yearly throughput of 81,000 gallons. These vessels are used to store gasoline blend stock with a maximum vapor pressure of 35 psia. All systems including loading and unloading are maintained at 55 psia minimum.

This existing source is being re-permitted under this exemption.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality
Original Signed by Paul Dubenetzky

APD

cc: File - Allen County
Allen County Health Department
Air Compliance - Jennifer Dorn
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name: Gladieux Trading and Marketing, LLP
Source Location: 4133 New Haven Avenue, Fort Wayne, Indiana 46803
County: Allen
SIC Code: 5171
Exemption No.: 003-14155-00317
Permit Reviewer: Aida De Guzman

The Office of Air Quality (OAQ) has reviewed an application from Gladieux Trading and Marketing, LLP relating to the operation of the following equipment:

- (a) Six (6) horizontal pressure vessels, identified as PV-1 through PV-6, built above ground. Each vessel has a capacity of 30,000 gallons and a maximum yearly throughput of 81,000 gallons. These vessels are used to store gasoline blend stock with a maximum vapor pressure of 35 psia. All systems including loading and unloading are maintained at 55 psia minimum.

Existing Approvals

The six (6) pressure vessels, including the plant were owned by Phelps Dodge Magnet Wire Company, and were bought by Gladieux Trading and Marketing, LLP. These vessels were permitted and operating under an issued registration for Phelps Dodge Magnet Wire Company. The new owner has applied for the re-approval of the plant.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 21, 2001

Emission Calculations

- (a) Six Pressure Vessels Emissions:

The plant is used only to store gasoline blend stock, coming from another Gladieux Trading, located in Huntington, Indiana.

There are **no emissions** coming from this pressure vessels, because they are designed to operate at 55 psia (380 kPa). The loading and unloading system is also designed to

operate at this pressure level.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 0.0 |
| PM-10 | 0.0 |
| SO ₂ | 0.0 |
| VOC | 0.0 |
| CO | 0.0 |
| NO _x | 0.0 |

Justification for the Level of Approval

The source is exempted from the registration and permitting requirements of article 326 IAC 2-1, because no regulated pollutant is emitted by the source.

County Attainment Status

The source is located in Allen County.

| Pollutant | Status |
|-----------------|----------------|
| PM-10 | attainment |
| SO ₂ | attainment |
| NO ₂ | attainment |
| Ozone | attainment |
| CO | attainment |
| Lead | not determined |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing re-permitted source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity):

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | 0.0 |
| PM-10 | 0.0 |
| SO ₂ | 0.0 |
| VOC | 0.0 |
| CO | 0.0 |
| NO _x | 0.0 |

- (a) This existing re-permitted source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

- (a) 326 IAC 2-7 (Part 70 Permit Program)
This existing re-permitted source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:
- (1) each criteria pollutant is less than 100 tons per year,
 - (2) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
 - (3) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60).
40 CFR Part 60.110b, Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction or Modification Commenced After July 23, 1984.

Pursuant to Section (d)(2) of this NSPS, pressure vessels are exempted from this NSPS, since they are designed to operate in excess of 204.9 kPa and without emissions to the atmosphere. Therefore, the six (6) pressure vessels in this application with operating pressure of 380 kPa are not subject to the NSPS.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability -

- (a) 326 IAC 8-4-3 (Petroleum Sources: Petroleum Liquid Storage Facilities)
This rule applies to petroleum liquid storage vessels with capacities greater than thirty-nine thousand (39,000) gallons, containing volatile organic compounds whose true vapor pressure is greater than 10.5 kPa (1.52 psi).

This rule is **not** applicable to the six (6) horizontal pressure vessels because each has a capacity of less than 39,000 gallons.

- (b) There are no other state rules applicable to these six (6) pressure vessels.

Conclusion

The operation of these pressure vessels shall be subject to the conditions of the attached
Exemption 003-14155-00317.